



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**MAY 18 2018**

Democracy 21  
2000 Massachusetts Avenue, NW  
Washington, DC 20036

RE: MURs 7017 & 7019  
DE First Holdings, *et al.*

To Whom It May Concern:

The Federal Election Commission has considered the allegations contained in your complaint dated February 24, 2016, but was equally divided on whether to find reason to believe that the Respondents violated the Federal Election Campaign Act of 1971, as amended. Accordingly, on May 10, 2018, the Commission closed the files in these matters. A Statement of Reasons providing a basis for the Commission's decision will follow.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016.

The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. *See* 52 U.S.C. § 30109(a)(8). If you have any questions, please contact Claudio J. Pavia, the attorney assigned to this matter, at [cpavia@fec.gov](mailto:cpavia@fec.gov) or (202) 694-1597.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Shonkwiler", followed by a long horizontal line.

Mark Shonkwiler  
Assistant General Counsel